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Attorney for Plaintiff.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF THE NORTHERN MARIANA ISLANDS

SAIPAN HANDICRAFT,]	Civil Action No. 05-0040
]	
Plaintiff,]	
vs.]	DECLARATION OF PLAINTIFF’S
]	COUNSEL IN SUPPORT OF
MICRONESIA WOODCRAFT ENT., INC.,]	APPLICATION FOR ENTRY OF
et al.,]	DEFAULT JUDGMENT AGAINST
]	GREAT SUNSHINE CORPORATION
Defendants.]	dba HANEY
]	

I, F. Matthew Smith, hereby depose and say:

1. I am a duly licensed attorney and I am admitted to practice before all courts of the CNMI;
2. I am counsel for Plaintiff Saipan Handicraft in this matter;
3. That on April 18, 2006, I caused to be filed Plaintiff’s First Amended Verified Complaint naming Defendant Great Sunshine Corporation dba Haney as a party in this matter;
4. That on April 21, 2006, at my direction, a Summons and a copy of Plaintiff’s First Amended Verified Complaint was served on Defendant Great Sunshine Corporation dba Haney by personally delivering the documents to Li Dan, managing agent for Haney’s;
5. That on April 26, 2006, at my direction, a Proof of Service on Defendant Great Sunshine Corporation dba Haney was filed with the Court;

EXHIBIT “A”

6. That from the date of service of the Summons and a copy of Plaintiff's First Amended Verified Complaint to present, Defendant Great Sunshine Corporation dba Haney has failed to file a responsive pleading or otherwise defend the suit;

7. That more than twenty (20) days have elapsed since Defendant was served with the Summons and a copy of Plaintiff's First Amended Verified Complaint; and

8. That to my knowledge the Clerk of Court has not received any Answer, responsive pleading or other communication from Defendant in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true, correct, and to the best of my knowledge.

Affiant sayeth naught.

Executed this 6th day of July, 2006, Saipan, the Commonwealth of the Northern Mariana Islands.

/s/ F. Matthew Smith

F. MATTHEW SMITH
Attorney for Plaintiff Saipan Handicraft